

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO**

JANE ROE, individually and on behalf of all  
others similarly situated,

Plaintiff,

vs.

INTELLICORP RECORDS, INC., an Ohio  
corporation, and DOES 1-50, inclusive,

Defendant.

Case No.: 1:12-CV-02288-JG

Judge: James S. Gwin

**REPLY DECLARATION OF NANCE F.  
BECKER IN SUPPORT OF PLAINTIFF'S  
MOTION FOR CLASS CERTIFICATION**

I, Nance F. Becker, declare:

1. I am an attorney admitted to practice before all courts of the State of California and I have been admitted *pro hac vice* to represent Plaintiff Jane Roe in this action. I have personal knowledge of the matters stated below, and if called upon to do so I could testify competently to them.

2. Attached to this reply as Exhibit U is a true and correct copy of Defendant Intellicorp Records, Inc.'s Response to Plaintiff Jane Roe's Second Set of Requests for Production of Documents, dated January 7, 2013.

3. Attached to this reply as Exhibit V is a true and correct copy of Defendant Intellicorp Records, Inc.'s Designation of Experts, served January 28, 2013.

4. Attached to this reply as Exhibit W is a true and correct copy of additional excerpts from the Deposition of Jane Roe taken January 22, 2013.

5. Attached to this reply as Exhibit X is a true and correct copy of an Order in the case *Hall v. Vitran Express, Inc.* (USNDO Court Case 1:09-cv-00800-DAP), cited in Plaintiff's Reply Memorandum at p. 6.

6. Attached to this reply as Exhibit Y are additional excerpts from the Deposition of David Garrett taken December 14, 2012.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and was executed on March 18, 2013 at Mill Valley, California.

/s/ Nance F. Becker  
Nance F. Becker